

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF MICHIGAN**

In re)
) Chapter 9
)
CITY OF DETROIT, MICHIGAN,) Case No. 13-53846
)
Debtor.) Hon. Steven W. Rhodes
)
) Expedited Consideration
) Requested

***EX PARTE* MOTION FOR SHORTENED NOTICE AND EXPEDITED
HEARING ON MOTION FOR PROTECTIVE ORDER**

Syncora¹ submits this *Ex Parte* Motion for Shortened Notice and Expedited Hearing on the *Motion for Protective Order* (the “Motion for Protective Order”) and respectfully represent as follows:

Jurisdiction and Venue

1. The Court has jurisdiction over this matter under 28 U.S.C. §§ 157 and 1334. Venue is proper in this district under 28 U.S.C. §§ 1408 and 1409.

Relief Requested and Basis for Relief

2. Pursuant to Bankruptcy Rule 9006(c) and Local Bankruptcy Rule 9006-1(b), this Court may, *ex parte*, shorten the notice period provided by Local Bankruptcy Rule 9014-1 for a party to take any action or file any paper. Fed. R. Bankr. P. 9006(c); E.D. Mich. LBR 9006-1(b).

¹ Capitalized terms not defined herein have the meanings given to them in Syncora’s Motion for Protective Order.

3. Syncora respectfully requests that, pursuant to Bankruptcy Rule 9006(a) and Local Bankruptcy Rule 9006-1(b), the Court shorten the notice period with respect to the Motion for Protective Order and schedule an expedited hearing on the Motion for Protective Order on **May 12, 2014**.

4. Contemporaneously with the filing of this *Ex Parte* Motion, Syncora filed the Motion for Protective Order. For the reasons stated in the Motion for Protective Order, Syncora seeks the entry of an order allowing Syncora to designate its non-public, proprietary and/or commercially sensitive information as Confidential and limited the disclosure of confidential information to certain circumstances.

5. The Court has scheduled a hearing for May 12, 2014 in connection with objections to written discovery. (*See* Fourth Amended Order Establishing Procedures, Dates, Deadlines and Hearing Dates Relating to the Debtor's Plan of Adjustment, Doc. No. 4202.) The Motion for Protective Order addresses a major issue regarding the written discovery process, which is necessary to address as parties begin the production process. Syncora submits that efficiency would be served by hearing the Motion for Protective Order on May 12, 2014.

6. Syncora will serve this *Ex Parte* Motion to the parties in the above-captioned proceedings and will provide notice of the *ex parte* order upon issuance pursuant to E.D. Mich. LBR 9006-1(b).

Conclusion

WHEREFORE, Syncora respectfully requests that the Court enter an Order, substantially in the form attached as Exhibit 1, granting the relief requested in this *Ex Parte* Motion and granting such further relief as this Court deems appropriate.

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Dated: May 7, 2014

Respectfully submitted,

KIRKLAND & ELLIS LLP

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